

April Barker

From: April Barker
Sent: Wednesday, July 28, 2021 8:27 PM
To: WalkerL@ballardspahr.com; Kevin Vick; Friedman, James
Cc: George Burnett; Debra L. Bursik
Subject: Discovery / follow-up

Leita, Kevin, and James,

Based on the Court's comments today, it appears that something more substantive will have to be submitted before the judge will agree to enter the protective order. I assume that you are likely preparing something for the Court in that regard.

In the meantime, in the interests of avoiding further delay, we would like to move forward with respect to responsive discovery materials that would not be designated as confidential under a protective order when entered. Please confirm that the materials that are not claimed to be confidential can be forwarded while we sort out the protective order issues.

Thanks very much,
April

EXHIBIT

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